

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

ROOSEVELT HARRIS

PLAINTIFF

VS.

CIVIL ACTION NO. 3:18cv00059-DPJ-FKB

MURPHY OIL USA, INC.

DEFENDANT

RESPONSE TO AMENDED MOTION TO WITHDRAW

Murphy Oil USA, Inc. ("Murphy") has no objection to the request of Plaintiff's counsel to withdraw, so long as the order is conditioned upon Plaintiff meeting the following obligations:

1. First, Murphy requests that Plaintiff be required to take one of the following actions within thirty days: either (a) have new counsel enter an appearance in this matter or (b) inform the Court and Murphy in writing that he will proceed *pro se*.
2. Second, Murphy requests that at the same time as the Plaintiff satisfies the obligations in Paragraph One, he be required to respond to Murphy's discovery requests which have been pending since April 25, 2018, and to which no response has been provided.
3. Finally, while Murphy requests that for the time being all current deadlines remain in force and effect, it reserves the right to request extensions of any deadlines which have not already expired, particularly its expert disclosure deadline, the discovery deadline, and the motion deadline.

This 20th day of July, 2018.

Respectfully submitted,

MURPHY OIL USA, INC.

By Its Attorneys,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

By: *s/D. Sterling Kidd*
D. STERLING KIDD

D. Sterling Kidd (MB No. 103670) (skidd@bakerdonelson.com)

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record and have delivered same by U. S. Mail, postage prepaid to:

Mr. Roosevelt Harris
#142877
CMRCF.C-ZONE
33714 Highway #35
Vaiden, MS 39176

This 20th day of July, 2018.

s/D. Sterling Kidd
D. STERLING KIDD